

RESPONSE TO COMMENTS

**DRAFT SITE INVESTIGATION REPORT AND
DECISION DOCUMENT FOR THE
TRAINING AIDS BUILDING (BUILDING 267), PARCEL 166(7)
FORT McCLELLAN, ALABAMA**

**RESPONSE TO COMMENTS BY THE ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

General Comments

Comment 1: ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting. ADEM is in general agreement with the conclusions and recommendations for the Site Investigation Report for Training Aids Building (Building 267).

Response: Comment noted.

Comment 2: Based on the analytical results from samples collected during the Site Investigation, it appears that operations at the site have had minimal impact on the environment, and the potential threat to human and ecological receptors from the site is low.

Response: Comment noted.

Specific Comments

Comment 1: Page 6-2, section 6.0: ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting.

Response: Comment noted.

Comment 2: Appendix B: Monitoring Well Installation Detail: Please describe the “Drilling Method:” on all the forms.

Response: The forms will be revised to include the drilling method.

Comment 3: **Appendix F, Attachment A: Data Validation Qualifier Entry Verification Report: Sample Number EL0001 through EL3003 are lacking units. Please add the units to all sample results.**

Response: The appendix will be revised to include the appropriate units.

DRAFT DECISION DOCUMENT

General Comments

Comment 1: **ADEM is aware that the language will be changing for the “No Further Action” as to the specifics of the land use and the land use controls. This language change was discussed in the September BRAC Cleanup Team (BCT) meeting. ADEM is in general agreement with the Draft Decision Document.**

Response: Comment noted.

Comment 2: **Based on the analytical results from samples collected during the Site Investigation, it appears that operations at the site have had minimal impact on the environment, and the potential threat to human and ecological receptors from the site is low.**

Reponse: Comment noted.

Specific Comments

No Comments

**DRAFT SITE INVESTIGATION REPORT AND
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TRAINING AIDS BUILDING (BUILDING 267), PARCEL 166(7)
FORT McCLELLAN, ALABAMA**

RESPONSE TO COMMENTS BY FORT McCLELLAN

COMMENTS ON DRAFT SITE INVESTIGATION REPORT

Comment 1: **List of Tables: Comment - Delete “and” in the title for Table 3-1.
Rationale - The word needs to be deleted to make the title in the
List of Tables match the title used on the table in the document.**

Response: Agree. The text will be revised per comment.

Comment 2: **Page ES-1, line 27: Comment - Delete “also” in the first sentence.
Rationale - The word needs to be deleted for the sentence to read
properly when combined with the rest of the Executive Summary.
No mention of potential threats to other receptors has been
previously made in the summary.**

Response: Agree. The text will be revised per comment.

Comment 3: **Page ES-1, line 32: Comment - Insert “the” after “within”.
Rationale - The word is needed to make the sentence
grammatically correct.**

Response: Agree. The text will be revised per comment.

Comment 4: **Page 2-1, line 10: Comment - Change “released” to “release”.
Rationale - The word needs to be changed to make the sentence
grammatically correct.**

Response: Agree. The text will be revised per comment.

Comment 5: **Page 3-1, line 17: Comment - Insert “locations” after “two”.
Rationale - The word needs to be added to make the sentence
complete.**

Response: Agree. The text will be revised per comment.

Comment 6: **Table 3-3, FTA-166-GP01(W): Comment - Change the entry in
the Easting column from “71336.784 (W)” to “671336.784”.**

Rationale - The entry for the column is incorrect according to the survey data in Appendix D.

Response: Agree. The table will be revised per comment.

Comment 7: **Page 3-4, lines 1-2: Comment - Delete lines 1 and 2.**
Rationale - The sentence on these lines is a repeat of the preceding sentence on page 3-3.

Response: Agree. The text will be revised per comment.

Comment 8: **Table 3-4: Comment - Change the ground elevations for PPMP-75-GP68, PPMP-75-GP69 and PPMP-75-GP73 to 779.61, 788.77 and 777.74 respectively.**
Rationale - The ground elevations shown in the table for these locations do not match the elevations shown in the Site Investigation Report for Parcel 75(7) which appear to be correct. Ground elevations currently shown in Table 3-3 would result in the groundwater elevations for PPMP-75-GP68 and PPMP-75-GP69 being above the ground elevation.

Response: Agree. The elevations will be reviewed and revised as necessary.

Comment 9: **Page 3-5, line 32: Comment - Change “Appendix B” to “Appendix A”.**
Rationale - The analysis request and chain of custody records are included in Appendix A not Appendix B.

Response: Agree. The text will be revised to indicate the correct appendix.

Comment 10: **Page 4-4, line 23: Comment - Delete the first “a” in the line.**
Rationale - The word needs to be deleted to make the sentence grammatically correct.

Response: Agree. The text will be revised per comment.

Comment 11: **Page 4-5, line 26: Comment - Insert “is” after “base”.**
Rationale - The sentence is incomplete if the word is not inserted.

Response: Agree. The text will be revised per comment.

Comment 12: **Page 5-2, line 9: Comment - Insert “at the” after “analyses”.**
Rationale - The sentence is incomplete if the words are not inserted.

Response: Agree. The text will be revised per comment.

- Comment 13:** Page 5-4, line 12: **Comment - Change “below” to “above”.**
Rationale - The information in Table 5-3 indicates that the concentration of bis(2-ethylhexyl)phthalate was above the SSSL not below it (0.0075 mg/L compared to a SSSL of 0.0043 mg/L).
- Response:** Agree. The text will be revised per comment.
- Comment 14:** Page 6-1, line 24: **Comment - Delete “also” in the first sentence.**
Rationale - The word needs to be deleted for the sentence to read properly when combined with the rest of the summary, conclusions and recommendations. No mention of potential threats to other receptors has been previously made in the summary.
- Response:** Agree. The text will be revised per comment.
- Comment 15:** Page 6-1, line 29: **Comment - Insert “the” after “within”.**
Rationale - The word needs to be added to make the sentence grammatically correct.
- Response:** Agree. The text will be revised per comment.
- Comment 16:** Attachment 1, List of Abbreviations and Acronyms, page Att. 1-1: **Comment - Delete “(continued)” in the title of the page.**
Rationale - The page is the first page of the attachment and not a continuation page.
- Response:** Agree. The text will be revised per comment.
- Comment 17:** Appendix A, Sample Collection Logs: **Comment - Fill out incomplete sections of the sample collection logs.**
Rationale - Many of the sample collection logs have sections (Sketch Location, Logged By/Date and Reviewed By/Date) that have not been completed.
- Response:** IT will ensure that all paperwork is properly completed in the future.
- Comment 18:** Appendix F, page 1, line 7: **Comment - Delete “=” in “SDG=s”.**
Rationale - The acronym is incorrect if the = sign is not omitted.
- Response:** Agree. The text will be revised per comment.
- Comment 19:** Appendix F; page 1, line 22; Page 2, line 5: **Comment - Delete “=” in “SOP=s”.**
Rationale - The acronym is incorrect if the = sign is not omitted.

Response: Agree. The text will be revised per comment.

Comment 20: **Appendix F, page 1, lines 27-28: Comment - Delete “A” in line 27 and “@” in line 28.**

Rationale - The deletions need to be made for the sentence to be grammatically correct.

Response: Agree. The text will be revised per comment.

Comment 21: **Appendix F, page 2, line 9: Comment - Replace “>R=” with “‘R’”.**

Rationale - The symbols were incorrectly used instead of quotation marks.

Response: Agree. The text will be revised per comment.

Comment 22: **Appendix F, page 2, line 10: Comment - Delete “A” and “@”.**

Rationale - The deletions need to be made for the sentence to be grammatically correct.

Response: Agree. The text will be revised per comment.

Comment 23: **Appendix F, page 2, line 12: Comment - Change “>R=” to “‘R’”.**

Rationale - The symbols “>” and “=” were incorrectly inserted.

Response: Agree. The text will be revised per comment.

Comment 24: **Appendix F, page 2, line 20: Comment - Change “>use=” to “‘use’”.**

Rationale - The symbols “>” and “=” were incorrectly inserted.

Response: Agree. The text will be revised per comment.

Comment 25: **Appendix F, page 3, lines 4-5: Comment - Replace “>R=” with “‘R’”, “>J=” with “‘J’” and “>B=” with “‘B’”.**

Rationale - The symbols were incorrectly used instead of quotation marks.

Response: Agree. The text will be revised per comment.

Comment 26: **Appendix F, page 3, line 8: Comment - Replace “>B=” with “‘B’”.**

Rationale - The symbols were incorrectly used instead of quotation marks.

Response: Agree. The text will be revised per comment.

Comment 27: Appendix F, page 3, lines 12-14: **Comment - Replace “>UJ=” with “UJ”, “>R=” with “R”, “>J=” with “J” and “>B=” with “B”.**

Rationale - The symbols were incorrectly used instead of quotation marks.

Response: Agree. The text will be revised per comment.

Comment 28: Appendix F; page 7, line 2; page 8, line 20: **Comment - Insert a space between “35%” and “criteria”.**

Rationale - The space is needed between the words to make the punctuation correct.

Response: Agree. The text will be revised per comment.

Comment 29: Appendix F, page 7, line 21: **Comment - Insert a blank line after line 21.**

Rationale - A blank line needs to be inserted to provide the same spacing between paragraphs as used elsewhere in the appendix.

Response: Agree. The text will be revised per comment.

Comment 30: Appendix F, paragraph 5.0, pages 9 and 10: **Comment - Add the information for the tables for the quality assurance field split sample data evaluation.**

Rationale - The table headings are included but no information is in the tables.

Response: Information in the tables is correct for the table headings.

Comment 31: Appendix F, page 9, line 22: **Comment - Delete the bullet symbol between “RL” and “s”.**

Rationale - The symbol was incorrectly inserted and needs to be removed to correct the punctuation of the sentence.

Response: Agree. The text will be revised per comment.

COMMENTS ON DRAFT DECISION DOCUMENT

Comment 1: Page 1, U.S. Army Announces Decision Document, second column, line 20: **Comment - Delete the hyphen at the end of the line.**

Rationale - The hyphen needs to be deleted to make the punctuation of the sentence correct.

Response: Agree. The text will be revised per comment.

Comment 2: **Page 4, Site Investigation, second column, line 8: Comment - Insert “the” after “within”.**
Rationale - The word needs to be inserted to make the sentence grammatically correct.

Response: Agree. The text will be revised per comment.

Comment 3: **Page 4, Description of No Further Action, line 2: Comment - Change “Parcels” to “Parcel”.**
Rationale - Action is being discussed on only one parcel.

Response: Agree. The text will be revised per comment.

Comment 4: **Page 7, Signature Blocks: Comment - Change the signature block for Mr. Ryan to Glynn D. Ryan, Site Manager.**
Rationale - The correct title for Mr. Ryan is Site Manager.

Response: Agree. The text will be revised per comment.

**DRAFT SITE INVESTIGATION REPORT AND
DECISION DOCUMENT FOR THE
TRAINING AIDS BUILDING (BUILDING 267), PARCEL 166(7)
FORT McCLELLAN, ALABAMA**

**RESPONSE TO COMMENTS BY THE U.S. ENVIRONMENTAL PROTECTION
AGENCY, REGION IV**

Comment 1: The Draft SI Report for the Training Aids Building appears to be well presented and the recommendation for no further action is justified. The following comments are offered to improve the quality of the document and have no bearing on the final conclusions and recommendations of this report. However, these comments should be addressed before the document is finalized.

Response: Comment noted.

OVERALL TECHNICAL COMMENTS

Specific Comments

Comment 1: Section 3.1.1, page 3-1. The text states, "Surface soil samples were collected from two at the Training Aids Building (Building 267), Parcel 166(7)." Please indicate where the two soil samples were collected.

Response: Agree. The text will be revised per comment.

Comment 2: Appendix B, Boring Logs and Well Logs. Drilling logs for hole numbers FTA-166-Gp01 and FTA-166-GP02 total borehole depths on the graphic log do not match the borehole depth of item 14 in the heading of the log. These discrepancies in the boring logs should be corrected.

Response: Agree. The boring logs will be reviewed and revised as necessary.

RISK ASSESSMENT COMMENTS

General Comment

Comment 1: Many of the metals were eliminated from consideration because the concentrations were said to be in the range of the background values.

Comparison to a range of background values is not generally a conservative approach to use in eliminating contaminants that exceed screening criteria from further consideration. A detailed "weight-of-evidence" discussion is needed in the text if the metals exceeding screening criteria are to be dropped from further consideration. Preliminary Risk Evaluation calculations may also be useful in determining the potential future risks associated with metal concentrations in groundwater, and soils.

Response: Based on previous discussions with EPA during BCT Meetings, comparison to the range of background is not unreasonable in determining metals of concern.

Specific Comment

Comment 1: Section 6.0, page 6-1. This section provides a summary of the report and conclusions recommendations. It appears that a paragraph has been inadvertently omitted since there is no discussion pertaining to the five metals detected in surface soil which exceeded the ESVs. These exceedances should be discussed in future versions of this document.

Response: The metals that exceeded ESVs were not discussed because these metals concentrations were below background concentrations. However, the text will be revised per comment.

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DECISION DOCUMENT FOR THE
TRAINING AIDS BUILDING (BUILDING 267), PARCEL 166(7)
FORT McCLELLAN, ALABAMA**

**RESPONSE TO COMMENTS BY THE U.S. ARMY CORPS OF ENGINEERS,
MOBILE DISTRICT**

Comment 1: Page 3-1, Line 17. Should the word “locations” be inserted after “two”?

Response: Yes. The text will be revised per comment.

Comment 2: Table 3-4. The table indicates that the groundwater elevation is higher than the ground elevation in two wells. Please verify.

Response: The elevations will be reviewed and revised as necessary.

Comment 3: General. Include information on the sampling results from the samples recently collected from the sump.

Response: Information on the sump removal will be included in the Final SI Report.

DRAFT DECISION DOCUMENT

Comment 1: Per BCT agreements, remove “No Further Action” from the document title.

Response: Agree. The text will be revised per comment.

END OF COMMENTS